## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

	)	
JASON BOUDREAU,	)	
Plaintiff,	)	
	)	
V.	)	C.A. No. 17-cv-301-S-PAS
	)	
KEVIN PETIT, et al.	)	
Defendants.	)	
	)	

## **DEFENDANTS' JOINT MOTION FOR A STAY OF PROCEEDINGS**

Defendants, Kevin Petit ("Petit"), City of Warwick ("Warwick"), the Warwick Police Department ("WPD," collectively with Petit and Warwick, the "Warwick Defendants"), Steve Lussier ("Steve"), John Lussier ("John"), Donald Lussier ("Donald," collectively with Steve and John, the "ATC Defendants"), and the Rhode Island State Police ("State Defendant") respectfully and jointly request that the Court stay all proceedings in this civil case until the conclusion of Plaintiff's pending state criminal proceeding. The factual and legal issues in the instant case significantly overlap with the parallel state criminal prosecution and staying this proceeding will promote the interests of the Court, judicial economy and the public's interest in the integrity of the criminal case. An accompanying memorandum has been filed in support of this motion.

For the reasons stated the Defendants request that this Honorable Court stay all proceedings in this instant matter.

Respectfully submitted:

RHODE ISLAND STATE POLICE By their Attorney

PETER F. KILMARTIN ATTORNEY GENERAL

/s/ Susan E. Urso /s/ Kate C. Brody

Kate C. Brody, Bar No. 8425 Special Assistant Attorney General Susan E. Urso, Bar No. 4688 Assistant Attorney General 150 South Main Street Providence, RI 02903 (401) 274-4400, Extension 2293/2233 Fax No. (401) 222-2995 kbrody@riag.ri.gov surso@riag.ri.gov

CITY OF WARWICK, WARWICK POLICE DEPARTMENT and KEVIN PETIT,

By their Attorney,

/s/ Marc DeSisto

Marc DeSisto, Esq. (#2757)
DESISTO LAW LLC
211 Angell Street
Providence, RI 02906
401-272-4442
marc@desistolaw.com

## STEVE LUSSIER, JOHN LUSSIER, AND DONALD LUSSIER

By their Attorneys,

/s/ Douglas A. Giron /s/ Christopher J. Fragomeni

Douglas A. Giron, #2943 Christopher J. Fragomeni, #9476 SHECHTMAN HALPERIN SAVAGE, LP 1080 Main Street, Pawtucket, RI 02860

Tel: (401) 272-1400 Fax: (401) 272-1403 dgiron@shslawfirm.com cfragomeni@shslawfirm.com

## **CERTIFICATE OF SERVICE**

I hereby certify that the within document has been electronically e-filed and e-served on all counsel of record on this 21<sup>st</sup> day of July, 2017 and it is available for viewing and downloading. A copy has also been mailed, postage prepaid, on this 21<sup>st</sup> day of July, 2017 to:

Jason Boudreau, #10950070 Donald W. Wyatt Detention Facility 950 High Street Central Falls, RI 02863

/s/ Kate C. Brody